

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

REJI SAMUEL, et al	*	CIVIL ACTION NO:
Plaintiffs	*	1:13-cv-00323-MAC-ZJH
	*	
v.	*	DISTRICT JUDGE
	*	MARCIA A. CRONE
SIGNAL INTERNATIONAL, LLC, et al,	*	
	•	MAGISTRATE JUDGE
Defendants	*	ZACK HAWTHORN
	*	

**EMERGENCY CONSENT MOTION TO EXTEND MOTION DEADLINE, DISCOVERY
DEADLINE AND DEADLINE FOR THE DEPOSITIONS OF EXPERTS**

This consent-based, emergency motion to extend three deadlines for the reasons about to be stated of Signal International, LLC, Signal International, Inc., Signal International Texas, G.P., and Signal International Texas, L.P. (“Signal”) moves the Court to sign the attached Order and do the following:

1. *Move the Motion Cut-Off in Samuel.* The substantive, legal issues are, across the Signal docket, the same or virtually the same; some cases contain civil RICO claims, others do not. Signal is sure that the Court wants duplication to be minimized. The current *Samuel* Motion cut-off is September 26, 2014 (Doc. #121). This should be matched to the one in *Joseph*, which is October 17, 2014 (Doc. #122). Then Signal can file one product in both cases, double captioned, and lessen the burden on everyone. Not only is this proposal plainly sensible from the standpoint of judicial economy, the current deadline in *Samuel*

is further complicated by the Jewish High Holidays, which fall on the 24th and arise again one week later. This request makes tremendous sense and should have no substantive impact on the Court's schedule. This proposal furthers not only judicial economy but consistency and uniformity where consistency and uniformity are desirable. Furthermore, Signal will *not* be moving for genuine summary judgment. Rather, Signal has a number of motions for partial summary judgment to present on distinct legal issues, identical ones, that characterize every Signal case on this docket arising out of *David*. The issues include questions of extraterritoriality with regard to the civil RICO claims; whether the undisputed facts preclude, as a matter of law, the conclusion that the plaintiffs were trafficked and many questions decided by the David court on the path to refusing to certify a class action. There is no reason whatever for the effort associated with presenting these common questions of law to give rise to or imply duplication. Just so, if the Court will grant this relief, Signal will file one, double captioned partial summary judgment motion, or motion parts, at the same time, in *Joseph* and *Samuel*. This Court will be able to approach the project, with less burden, accordingly. In addition, since this Court is now delving quite deeply into the *in terrorem* issue relative to Signal's immigration status and related discovery by virtue of Signal's motions to compel in *Joseph* and *Samuel*, one has the sense that the present motion may indeed lessen the burden on the Court. Signal's view, of course, is that the motions to compel present an issue of inestimable importance.

2. ***Extend to October 3, 2014 the discovery deadline.*** The parties have worked feverishly to meet the Court's deadlines and are working together marvelously, as evidenced by the quality of this motion. The plaintiffs have been deposed, for example, with one exception Signal will address later. The parties nonetheless seek a very modest extension of the

current deadline, which is September 19, 2014, they seek an extension to October 3, 2014, a few weeks. It will help the parties a lot and have zero impact, substantively, Signal submits, on the Court's schedule.

3. ***Extend to October 10, 2014 the deadline for expert depositions.*** Likewise, and the Court should bear in mind that there are many experts, experts who nonetheless provide the same opinions or roughly the same opinions in all cases, the parties jointly pray to extend the expert deposition deadline to October 10, 2014. The lawyers are cooperating beautifully to schedule many expert depositions around the nation. The Court would be impressed by the level of cooperation between counsel, the professionalism on display, and most importantly, the determination to get things of substance accomplished as rapidly as possible relative to experts. There just are so many, scattered around the country, and only certain counsel are truly situated to accomplish the task correctly. Therefore, not only is there good cause for this request as evidenced by this motion's joint quality, but the Court can feel confident that the modest help the parties seek is truly deserved, based on the level of professionalism on display.

WHEREFORE, with the consent of the plaintiffs, Signal prays:

1. That the Court harmonize the motion cut-off in *Samuel* to cause it to match the one in *Joseph*, i.e., 10/17/14 to facilitate the filing of one, double-captioned, joint motion product in two cases.
2. Extend discovery deadline to 10/3/14.
3. Extend deadline for depositions of experts to 10/10/14.

Respectfully submitted,

/s/ Erin Casey Hangartner

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CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2014, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to non-CM/ECF participants.

/s/ Erin Casey Hangartner
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CERTIFICATE OF CONFERENCE

Trial counsel conferred concerning the subject-matter of the present motion in accordance with local rules and agreed that the motion could be filed on a consensual basis, as evidenced by the foregoing.

/s/ Erin Casey Hangartner
ERIN CASEY HANGARTNER